

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ALFRED FELICIANO,

Plaintiff,

v.

Civil Action No. 04-12461-GAO

GLOBALWARE SOLUTIONS, INC. and  
GARY LORTIE,

Defendants.

and

GLOBALWARE SOLUTIONS, INC.,  
and GARY LORTIE,

Third-Party Plaintiffs,

v.

JAMES R. BARTLETT,

Third-Party Defendant.

**JOINT MOTION TO EXTEND  
DEADLINE UNDER SETTLEMENT ORDER**

The parties in the above-captioned matter, through their counsel, hereby move to extend the deadline to reopen the action, which was set by the Court's November 1, 2006 Settlement Order, from December 1, 2006 to December 14, 2006. As grounds for this Motion, the parties state as follows:

1. On November 1, 2006, the Court issued an Electronic Settlement Order allowing "any party, upon good cause shown, to reopen the action within 30 days [until Friday, December 1, 2006] if settlement is not consummated."

2. Since the issuance of the Court's thirty-day Settlement Order, the Plaintiff and Defendants have attempted to consummate settlement, and the Third-Party Plaintiff GlobalWare Solutions, Inc. and the Third-Party Defendant James R. Bartlett have attempted to determine whether and/or how the third-party claims in this matter will be resolved. However, the parties have been delayed in their efforts by their and their clients' travel schedules and by the Thanksgiving holiday such that the parties will not be able to finally report the status of this matter to the Court by the December 1, 2006 deadline.

3. The parties desire a modest thirteen (13) -day extension of the deadline set by the Court's 30-day Order (until December 14, 2006) to finalize their discussions concerning settlement and/or resolution of this case.

4. Neither the parties nor the Court will be in any manner prejudiced by this minor extension.

5. Accordingly, the parties respectfully request that the December 1, 2006 deadline set by the Court's November 1, 2006 Order be extended by thirteen (13) days or until Thursday, December 14, 2006.

WHEREFORE, for the reasons stated herein, the parties respectfully requests that the Court grant this Motion and extend the deadline set by the Court's November 1, 2006 Order to December 14, 2006.

Respectfully submitted,

ALFRED FELICIANO

GLOBALWARE SOLUTIONS, INC. and  
GARY LORTIE

By his attorneys,

By their attorneys,

/s/ Christopher M. Waterman  
Joseph L. Demeo, BBO # 561254  
Christopher M. Waterman, BBO #641190  
Demeo & Associates, P.C.  
One Lewis Wharf  
Boston, MA 02110  
(617) 263-2600

/s/ Scott J. Connolly  
Mark H. Burak, BBO # 558805  
Sandra E. Kahn, BBO # 564510  
Scott J. Connolly, BBO # 651007  
MORSE, BARNES-BROWN  
& PENDLETON, P.C.  
Reservoir Place  
1601 Trapelo Road  
Waltham, MA 02451  
(781) 622-5930

JAMES R. BARTLETT

By his attorneys,

/s/ Thomas S. Fitzpatrick  
Thomas S. Fitzpatrick, BBO # 556453  
Davis, Malm & D'Agostine, P.C.  
One Boston Place, 37th Floor  
Boston, MA 02108  
(617) 367-2500

Dated: November 22, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 22, 2006.

/s/ Scott J. Connolly  
Scott J. Connolly